

EXHIBIT A

State of South Carolina)	IN THE COURT OF COMMON PLEAS
)	
County of Richland)	2021-CP-__ - _____
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Larry Goodman,)	
)	
Plaintiff,)	
v.)	SUMMONS
)	
Colgate-Palmolive Company d/b/a)	
Hill's Pet Nutrition Sales, Inc.)	
)	
Defendants.)	
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TO THE DEFENDANT ABOVE-NAMED:

You are hereby summoned and required to answer the Complaint in this action, a copy of which is attached hereto and herewith served upon you, and to serve a copy of your answer to same upon the subscribed at 223 WEST STONE AVENUE, GREENVILLE, SC 29609 within thirty (30) days after the service of same, exclusive of the day of such service. If you fail to answer same within the thirty (30) day period, Plaintiff will apply to the Court for the relief demanded therein and judgment will be taken against you by default.

Respectfully submitted,

ARNOLD LAW FIRM, LLC

By: s/ Brian E. Arnold
 BRIAN E. ARNOLD
 S.C. Bar No. 16839
 223 West Stone Avenue
 Greenville, South Carolina 29609
 (864) 242-2427

Plaintiff, through its attorney, files this complaint alleging as follows:

1. Plaintiff is a South Carolina citizen and resides in Richland County and at all times worked in Richland County for Defendant.
2. Defendant is a foreign corporation that conducts business in Richland County, South Carolina and employed Plaintiff in Richland County as a truck driver.
3. This Court has jurisdiction to resolve the claims raised herein and venue is appropriate in this court. Plaintiff requests a Trial by Jury.
4. Plaintiff was employed by Defendant from April 1, 2012 until January 8, 2021 when he was terminated without cause.
5. Plaintiff moved on and took steps to become an owner-operator of a truck and began applying for many jobs. Plaintiff completed the process and was in line to work until he discovered that Defendant was telling these employers that Plaintiff had failed a drug test, which is false. The drug test that was given to Plaintiff was determined to have failed to follow proper protocols to assure accuracy. It was

deemed a bad test and canceled. Plaintiff's record with the proper agencies shows he never failed a drug test. Plaintiff has asked Defendant to stop telling these prospective employers that he failed a drug test. Plaintiff received no response.

6. Because of Defendant's false statements about Plaintiff, Plaintiff has lost the opportunity to gainful employment that would have reasonably provided Plaintiff an income of over \$100,000.

**For a First Cause of Action
Interference With Prospective Contractual Relations/
Advantageous Business Relations**

7. Plaintiff incorporates by reference the foregoing averments as if set forth in full.
8. Defendants have intentionally interfered with prospective contractual relations between Plaintiff and prospective employers and advantageous relationships. Such prospective employers that Defendant have interfered with Landstar Logistics, XPO Logistics, and Bolt Express Logistics
9. Such interference was accomplished by Defendant making the defamatory statement that Plaintiff failed a drug test.
10. Defendant had actual or constructive notice of the existence of the prospective contracts and advantageous relations and had no justification to interfere with the same in the wrongful manner in which they did.
11. Defendant had an improper purpose related to their interference with the prospective contractual and advantageous business relationships and used methods of interference that were in violation of South Carolina law.

12. As a direct and proximate result of the Defendant's intentional actions, Plaintiff has suffered actual damages and is entitled to recover such damages from the Defendant.
13. Plaintiff also is entitled to an award of punitive damages due to the Defendants' intentional and malicious actions.

WHEREFORE, Plaintiff requests a trial by jury and an entry of judgment against Defendant on his claim of interference with prospective contractual and advantageous relations in an amount to be determined at trial but that should include actual, consequential, compensatory, and punitive damages, as well as all other relief to which Plaintiff is entitled including, but not limited to, costs and expenses as well as prejudgment and post-judgment interest.

**For a Second Cause of Action
Defamation of Character**

14. Plaintiff incorporates by reference paragraphs 1 through 13 fully as if contained herein.
15. Defendant has communicated to third parties that Plaintiff failed a drug test. Such false statement is severely damaging to a truck driver. These false statements were specifically made to harm Plaintiff's reputation and ability to gain employment
16. Defendant knowingly made these false statements to the third parties that impugned his personal and professional reputation.
17. Thus, Defendant defamed Plaintiff causing irreparable damage to Plaintiff's personal and profession reputation.
18. Such statements and insinuations are false and misleading.

19. Such defamatory statements were known to be false or at minimum were in reckless disregard of the truth.

WHEREFORE, Plaintiff respectfully requests a trial by jury on his claim of Defamation as well as entry of judgment in an amount to be determined at trial to include all available nominal, actual, compensatory, special, consequential, and punitive damages as well as all other relief to which Plaintiff can show an entitlement.

Respectfully submitted this 15th day of April 2021.

For the Plaintiff:

s/Brian E. Arnold
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